The Chillicothe Telephone Company Lead - Lag Study Revenues Analysis

Filed In Response to CC Docket No. 97-149,
ORDER DESIGNATING ISSUES FOR INVESIGATION
MEMORANDUM OPINION AND ORDER ON
RECONSIDERATION

DOCKET FILE COPY ORIGINAL

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of SEP-2 1997

In the Matter of OFFICE OF THE SECRETARY

Tariff Filings OFFICE OF THE SECRETARY OFFICE OF THE SECRETARY

DIRECT CASE OF THE CHILLICOTHE TELEPHONE COMPANY, INC.

The Chillicothe Telephone Company, Inc. (Chillicothe), by its attorneys and pursuant to the Commission's Order in CC Docket No. 97-149¹, hereby submits detailed documentation of particular elements used in its lead-lag study. Chillicothe is providing detailed documentation of supporting materials which it used in developing five (5) individual revenue lags about which the Commission has specifically inquired. In addition, Chillicothe is providing summary analyses of the methods and calculations used in computing each of the five individual revenue lags. The supporting documentation and analyses are attached as Exhibit 1.

As the supporting documentation indicates, Chillicothe properly conducted lead-lag studies and incorporated results into the calculation of its Cash Working Capital factor. The individual calculations and supporting documentation contained in Exhibit 1 provide a detailed explanation and basis for the five

List ABCDE

Order Designating Issues for Investigation, Memorandum Opinion and Order on Reconsideration, DA 97-1609 (Comm. Car. Bur., released July 28, 1997 and Public Notice indicating grant of extension of filing date, DA 97-1724 (Comm. Car. Bur., released August 13, 1997.)

revenue lag items and their contribution to the variance from the general 15-day lag standard.

In addition, Chillicothe maintains an internal policy of paying its expenses as rapidly as possible to maintain its reputation in the telecommunications supply and support industry and must continue to do so as a result of it relatively small size and position in the nationwide market. As a result, Chillicothe's calculation of its net lead-lag period can be skewed from the general national standard because of the smaller offsetting reduction applied for the expense lag factor.

The attached documentation provides detailed data in support of the five (5) revenue lag factors that the Commission has specifically inquired about. The information provides the Commission with an explanation and further support for Chillicothe's calculated lead-lag study and resultant Cash Working Capital factor and calculation.

Respectfully submitted,

Its Attorney

The Chillicothe Telephone Company, Inc.

Blooston, Mordkofsky, Jackson & Dickens 2120 L Street, N.W. Washington, D.C. 20037

September 2, 1997

CERTIFICATE OF SERVICE

I hereby certify that I am an employee with the law firm of Blooston, Mordkofsky, Jackson & Dickens, and that on this 2nd day of September, 1997, I caused to be mailed via first class United States mail, postage prepaid, a copy of the foregoing "Direct Case of The Chillicothe Telephone Company, Inc." in CC Docket No. 97-149 to the following:

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Barmond J. Chranzon

Description and Justification

The following Description and Justification (D&J) pertains to The Chillicothe Telephone Company's (Chillicothe) 1997 annual access tariff filing. The D&J is in response to CC Docket No. 97-149, "In the Matter of 1997 Annual Access Tariff Filings: Order Designating Issues For Investigation, Memorandum Opinion And Order On Reconsideration," Released: July 28, 1997. Specifically, in accordance with paragraph 66, Chillicothe is documenting lead lag procedures for the following revenue analysis:

- 1. National Exchange Carrier Association (NECA) Carrier Common Line Settlements, Including Prior Period Adjustments
- 2. Other Common Carrier's Traffic Sensitive Revenues
- 3. Interstate Rents Receivables
- 4. Interstate AOS Inmate Services
- 5. Interstate Operator Services

Overview

Chillicothe's lead-lag study is an interstate study. In other words, Chillicothe identified the portion of interstate cash working capital required due to the lag in the receipt of revenues. A separate revenue lag is developed for each category of interstate revenue, including end users, interexchange carriers, coin, and other subscribers. A revenue lag is the average interval in days between the time services are rendered and the date collections for such services are deposited. Four separate time periods must be considered in determining the total time lag for each of the revenue categories:

- 1. "Service midpoint to end of service period" is the average date service is rendered to the end of the service period.
- "End of service period to billing extraction" is the time from the end of the service period to the date billing is generated.
- 3. "Billing extraction to collection" is the period of time from the date billing is generated to the date payment is received.
- 4. "Collection to deposit" is the period of time from the date a payment is received until the date it is deposited in a bank.

NECA Carrier Common Line Settlements, Including Prior Period Adjustments

NECA submits carrier common line settlements monthly to the company based on estimated annual carrier common line revenue requirement. When the annual 12-month calendar period is complete, the company prepares an actual carrier common line historical revenue requirement and submits the results to NECA. NECA compares the actual estimated settlements to the actual historical revenue requirement for the 12-month calendar period and collects or refunds the net difference.

Companies are allowed to make adjustments to 12-month calendar period revenue requirements for a period of 24 months. Therefore, to collect a representative sample of data for interstate carrier common

line revenues, Chillicothe studied one calendar year of data and all prior period adjustments impacting the same calendar year.

The sources of data used were the monthly 1990 EC3050 statements and the monthly EC2053 statements.

As discussed in the Overview section, typically there are four separate time periods to be considered in determining the total time lag for each of the revenue categories. For this analysis, there are two time periods.

- 1. "Service midpoint to end of service period" is the average date service is rendered to the end of the service period.
- 2. "End of service period to deposit" is the time from the end of the service period to the date the funds are wired to the company.

The "Service midpoint to end of service period" is always the average of one month. The "End of service period to deposit" is an additional 30 days for the monthly access revenue (EC3050) and increases in 30-day increments for 24 months for the prior period adjustments (EC2053).

This analysis resulted in an individual revenue lag of 194.88 days.

Other Common Carrier's Traffic Sensitive Revenues

An alternative to using the lead lag method to study the receipt of revenues is the balance sheet method. This method allows the company to study the revenue lag for billing to other common carriers (OCCs) by analyzing daily OCC's accounts receivable balances and bank deposits for a three month study period. This analysis provides the time period for:

- "Billing extraction to collection" is the period of time from the date billing is generated to the date payment is received.
- "Collection to deposit" is the period of time from the date a payment is received until the date it is deposited in a bank.

Chillicothe used the balance sheet method due to the volume of OCC CABS, and the laborious task of attempting to identify the "Billing extraction to collection" period due to the high incident of late payments and partial payments.

This analysis used the balance sheet method for a representative three-month period of July 1990 through September 1990. This method requires an analysis of the opening July 1, 1990 OCC accounts receivable balance, the daily current billings, the daily deposits, and the daily closing OCC accounts receivable balance. The "Billed Revenue Total Lag" is then calculated based on the results of the balance sheet method analysis.

The ending three month period's accumulated closing accounts receivable balance is divided by the accumulated total daily deposits to calculate an "Average days from billing extraction date to date of deposit." of 135 days. Then an "Average days from mid-point of billing period to end of billing period" of 15.21 days plus the "Average days from end of billing period to billing extraction date" of 10 days is added to the 135 days for a total "Average days from mid-point of billing period to date of deposit."

This analysis resulted in an individual revenue lag of 160.21 days.

Interstate Rent Revenue

The lead lag method was used to study interstate rent revenues. The four separate time periods were considered in determining the total time lag for each of the revenue categories:

- 1. "Service midpoint to end of service period" is the average date service is rendered to the end of the service period.
- 2. "End of service period to billing extraction" is the time from the end of the service period to the date billing is generated.
- 3. "Billing extraction to collection" is the period of time from the date billing is generated to the date payment is received.
- 4. "Collection to deposit" is the period of time from the date a payment is received until the date it is deposited in a bank.

This analysis resulted in an individual revenue lag of 114.96 days.

Interstate AOS Inmate Services

The lead lag method was used to study interstate AOS inmate revenues. The four separate time periods were considered in determining the total time lag for each of the revenue categories:

- 1. "Service midpoint to end of service period" is the average date service is rendered to the end of the service period.
- 2. "End of service period to billing extraction" is the time from the end of the service period to the date billing is generated.
- 3. "Billing extraction to collection" is the period of time from the date billing is generated to the date payment is received.
- 4. "Collection to deposit" is the period of time from the date a payment is received until the date it is deposited in a bank.

Chillicothe developed a total company AOS revenue lag-day. The revenue lag day was applied to the interstate jurisdictional AOS booked revenues to calculated interstate dollar days. The interstate portion of AOS revenues was used in calculated the final overall net revenue lag

This analysis resulted in an individual revenue lag of 93.75 days.

Interstate Operator Services

The lead lag method was used to study interstate operator services revenues. The four separate time periods were considered in determining the total time lag for each of the revenue categories:

- 1. "Service midpoint to end of service period" is the average date service is rendered to the end of the service period.
- 2. "End of service period to billing extraction" is the time from the end of the service period to the date billing is generated.
- 3. "Billing extraction to collection" is the period of time from the date billing is generated to the date payment is received.
- 4. "Collection to deposit" is the period of time from the date a payment is received until the date it is deposited in a bank.

Chillicothe developed a total company AOS revenue lag day. The revenue lag day was applied to interstate jurisdictional operator services booked revenues to calculated interstate dollar days. The interstate portion of operator services revenues was used in calculated the final overall net revenue lag

This analysis resulted in an individual revenue lag of 173.12 days

Summary of Revenue Lag Days

Various time periods were analyzed for each revenue item. Therefore, each revenue item was put on a three-month equivalent for the dollar amount and dollar days. Three months was used for the equivalency because three months was the minimum period of time analyzed for a given individual revenue item.

The resulting revenue lag days is 74.82. The calculation includes the following components:

Revenue Category	Amount	Dollar Days	Individual Lag Days
AT&T Traffic Sensitive	261,540.25	14,660,079.75	56.05
OCC Traffic Sensitive	226,154.00	36,232,132.00	160.21
NECA CCL Settlements and Prior Period Adjustments	117,086.00	22,817,851.00	194.88
End User	302,225.49	885,602.94	2.94
Coin	11,903.64	222,085.00	18.66
Operator Services	4,497.87	778,681.01	173.12
Rent Revenues	3,908.00	449,270.00	114.96
Operator Inmate Services	48,050.00	4,504,688.00	93.75
Billing and Collection	151,167.00	3,660,952.00	24.22
Total	1,125,532.25	84,211,341.70	_
Net Lag Days			74.82

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Chillicothe Telephone Company 1990 Lead-Lag Study Summary of Revenue Lead-Lag Days Filename:

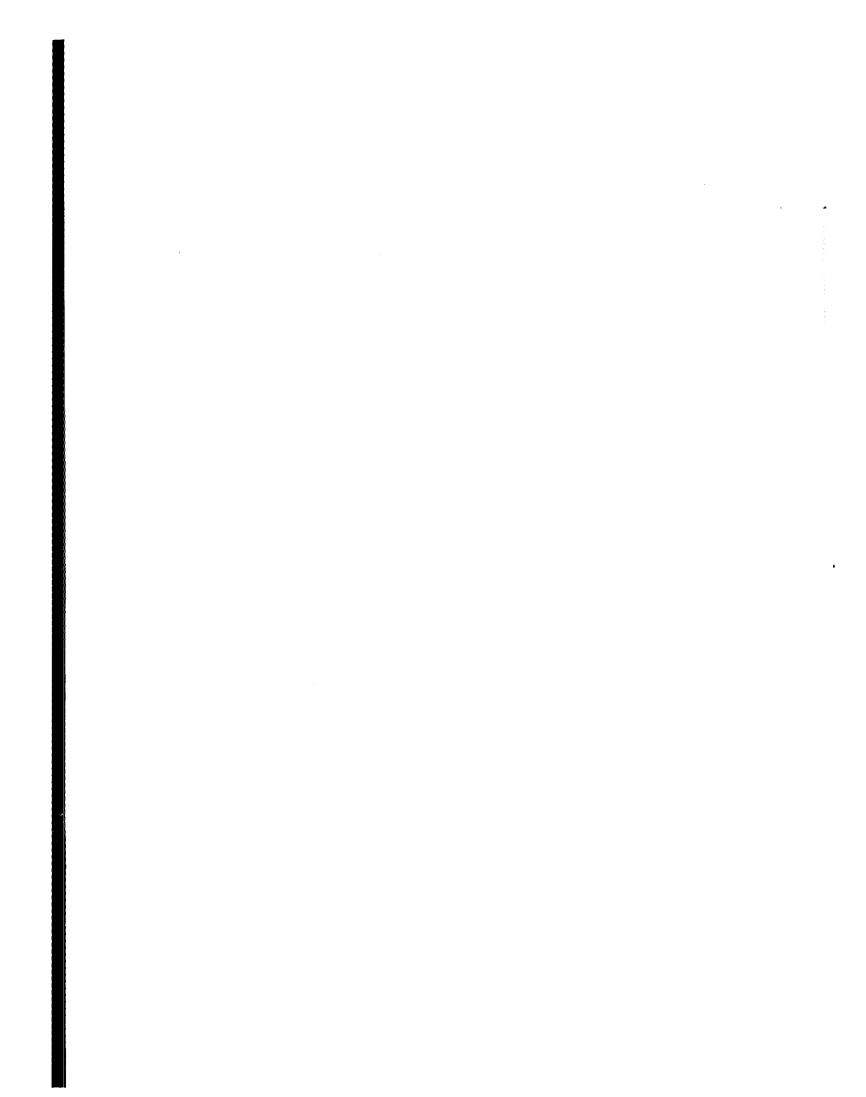
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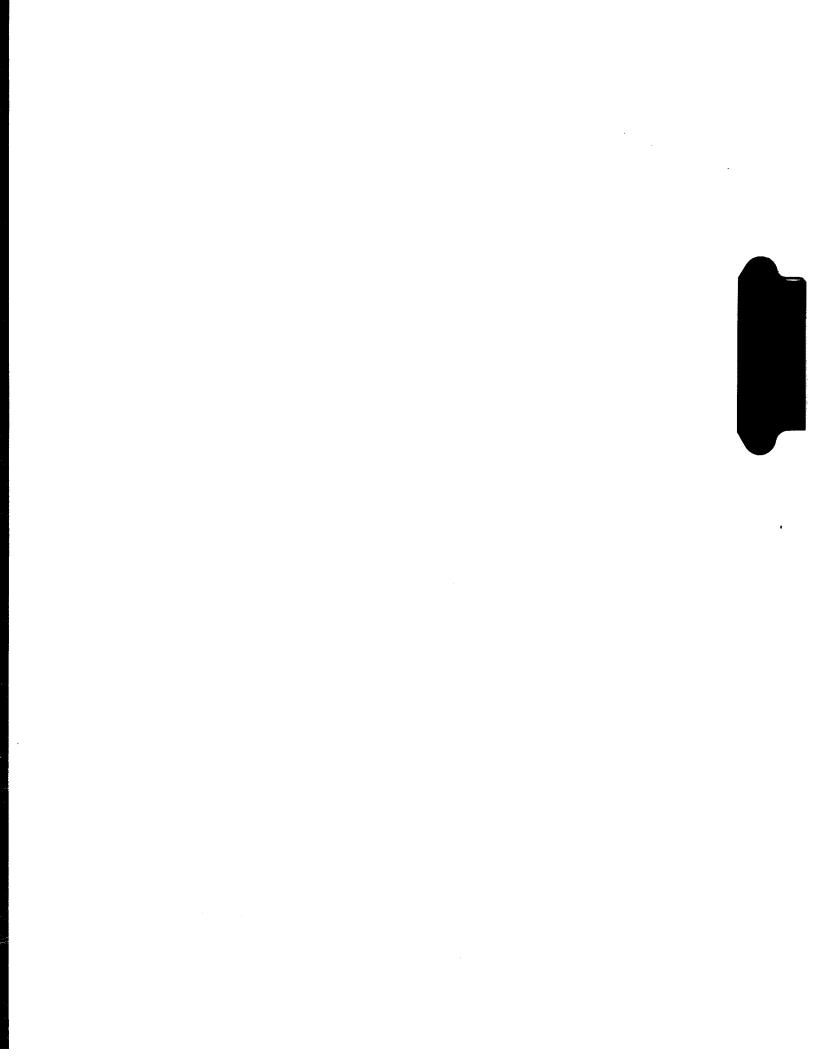
11 Includes the nonaccess revenue items !!

Revenue Category	Amount	Dollar Days	Individual Lead-Lag Days Source
AT&T Traffic Sen.	261,540.251	14,660,079.75	56 . 05 人
ÓCC Traffic Sen.	226,154.00	36,232,132.00 _{\(\)}	160.21 %
NECA CCL Settlements and PPAs	117,086.00	22,817,851.00 ¹ ,	194.88
End User,	301,225.49	885,602.94	2.941
Coin	11,903.64	222,085.00人	18.66
Operator Services	4,497.87	778,681.01	173.12
Rents Receivable	3908.001	449,270.001	114.96
AOS Inmate Services	48,050.00	4,504,688.00p	93.75
Billing & Collection	151,167.00/\	3,660,952.00^	24.22
Total	1,125,532.25	84,211,341.70	/

Net Lead-Lag Days

74.82 '





REVENUE LAG SUMMARY

Chillicothe Telphone Company Revenue Summary - OCC Service 1990 Review

*	Lag	Dollar	Dollar	
	Days	Amount	Days	Source
OCC	160.21	\$ 226,154	36,232,132	OCC

CASH WORKING CAPITAL LAG STUDY BILLED REVENUE TOTAL LAG 3 MONTH STUDY PERIOD THIRD QUARTER, 1990

Line #	Item	Dollars	Days and
	(A)	(B)	Dollar Days
			(C)
1.	3 Months Total Daily Deposits	\$184,507	
2.	3 Months Total Daily Closing Balances		OCC-6 \$24,958,977
3.	Average Days From Billing Extraction Date To Date Of Deposit (Line 2/Line 1)		OCC-6 135 Days
4.	3 Months Interstate Revenue – Arrears (Bill Amount July – September)	\$226,154	X15.21 Dollar 3,439,808 Days
5.	3 Months Interstate Revenue – Advance	N/A	X15.21 Dollar Days
6.	Total (Line 4 + Line 5)	\$226,154	Dollar Days 3,439,808
7.	Average Days From Mid-Point Of Billing Period To End Of Billing Period (Line 6, Col. C/line 6, Col. B)		
8.	Average Days From End Of Billing Period To Billing Extraction Date.		15.21 Days OCC-3
9.	Average Days From mid-Point Of Billing Period To Date Of Deposit (Col. C, Line 3 + Line 7 + Line 8)		160.21 Days

MONTHLY CALCULATION

fname: OCCBAM

Chillicothe Telephone Cash Working Capital Study OCC Analysis

Balance of Account Method

Month	Date	Current Billings	Daily Deposits	Closing Balance		PBC
Opening Bal July	1 2 3		\$27,788.38 _{\(\)}	\$585,080.00 \$585,080.00 \$557,291.62 \$557,291.62	Account 1180 - IXC	100
	3 4 5 6 7 8		\$27,638.43\ \$981.73\	\$557,291.62 \$529,653.19 \$528,671.46 \$528,671.46 \$528,671.46		
	9 10 11 12	प \$143,995.17 _/	10 Billing	\$528,671.46 \$672,666.63 \$672,666.63 \$672,666.63		
	13 14 15 16		\$35,426.77	\$672,666.63 \$672,666.63 \$672,666.63 \$637,239.86 \$625,814.23		
	17 18 19 20	÷	\$11,425.63\ \$638.26\ \$2,775.90\	\$625,175.97 \$622,400.07 \$622,400.07 \$622,400.07		
	21 22 23 24 25			\$622,400.07 \$622,400.07 \$622,400.07 \$622,400.07		
	26 27 28 29			\$622,400.07 \$622,400.07 \$622,400.07 \$622,400.07		
Total July	30 31	\$143,995.17 _k	\$197.63 \$1,833.64 \$108,706.37 OCC-II	\$622,202.44 \$620,368.80 \$18,914,495.74		

Month	Date	Current Billings	Daily Deposits	Closing Balance		1
Once Inc Dol			*************	\$620,368.80 CF orwar	-9	
Opening Bal	1			\$620,368.80	•	
August	ż		\$3,963.61	\$616,405-19		
	3			\$616,405.19		
	4			\$616,405.19	:	\$ ·
	5			\$616,405.19		
	6		\$19,709.55	\$596,695.64		
	7			\$596,695.64 \$596,695.64		
	8		477 0/	\$585,557.70		
	9		\$11,137.94			
	10	\$142,883.22		\$728,440.92 \$728,440.92		
	11			\$728,440.92		
	12			\$728,440.92		
	13			\$728,440.92		
	14 15		440 (OF TS	\$717,835.17		
	15		\$10,605.75	\$717,835.17		
`	16		•	\$717,835.17		
	17			\$717,835.17		
	18			\$717,835.17		
	19			\$717,835.17		
	20			\$717,835.17	2	
	21		\$179.29	\$717,655.88		
	22		4117.67	\$717,655.88		
	23 24		\$125.12	\$717,530.76		
	24		4123110	\$717,530.76		•
	25	:		\$717,530.76		
	26			\$717,530.76		
	27			\$717,530.76	-	
	28 29			\$717,530.76		
	30			\$717,530.76		
	.31			\$717,530.76		
	.51			~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	W Propries and India	1) for two months
Total August		\$142,883.22	\$45,721.26	\$21,304,242.81	- Karmine Lotze	l for two months

d sources to total for august port per printout of payment Pata Warepaper. OCC-11

Honth	Date	Current Billings	Daily Deposits	Closing Balance	. 0	ı				-
according that				\$717,530.76	Carry Corn	xorU		_		
Opening Bal	1			\$717,530.76						
Sept	2			\$717,530.76				•		
	2 3 4 5 6 7 8 9			\$717,530.76						
	4		\$3,847.95	\$713,682.81			:	:		
	5		:	\$713,682.81 \$713,682.81						
	6			\$713,682.81						
•	7			\$713,682.81						
	8			\$713,682.81						
	9	A454 570 07	\$105.35	\$865,115.53						
	10	\$151,538.07	\$20,624.12	\$844,491.41						
	12		\$44.24	\$844,447.17						
	13			\$844,447.17						
	14			\$844,447.17						
	15			\$844,447.17						
	16			\$844,447.17						
	17		\$4,337.19	\$840,109.98						
	18		\$20.02	\$840,089.96						
	19			\$840,089.96						
	20			\$840,089.96						
	21			\$840,089.96						
	22			\$840,089.96 \$840,089.96						
	23		A4 400 75 4	\$838,989.21						
	24		\$1,100.75人	\$838,989.21						
	25	•		\$838,989.21						
	26	•		\$838,989.21						
	27			\$838,989.21				•		
	28			\$838,989.21		•				
	29			\$838,989,21						
	30 31		400	# \$838,989.21	_		. 11	()		
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Total Sept		\$151,538.07 L	\$30,079.62\langle \(\sigma \)	\$24,959,095.35 ^	Kunning	101035				
Three Month Summ.		\$438,416.46	\$184,507.25				•			
Total Company Lag Da	ys			135						
				\$157,329.00	11					
Interstate Dollars	ve			\$21,282,575.68	0			*		
Interstate Dollar Da	173		-							
Interstate Lag				135.27	•					

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SAMPLE SUPPORTING DOCUMENTATION

Current Billings
Accounts Receivables
OCC Payment Ledger
CABS

Chillicothe Telephone Lead/Lag Current Billings By A/M/G 7/91

BY A/A/4 1/71	Prior			
Complex	July 190 Bal+	June Payments-	Prior June Bal= C	urrent Billings
Carrier				
AT&T	\$1.30 A	\$0.00	\$1.30 ^	\$0.00 \$1.79 [
Advanced Mkg. Svc.	\$98.98	\$194.75	\$291.94	
Advanced Network Sys.	\$581.92	\$0.00	\$373.13	\$208.79
Afford-A-Call	\$761.64	\$248.36	\$733.15	\$276.85
Advantage Comm	\$0.07	\$0.00	\$0.00	\$0.07
Allnet	\$5,899.14	\$3,290.48	\$6,008.21	\$3,181.41
Allnet 2	\$3,078.73	\$1,446.29	\$2,976.78	\$1,548.24
Cable & Wireless Comm	\$166.61	\$0.00	\$166.61	\$0.00
Cable & Wireless Comm 2	\$2.14	\$0.00	\$2.14	\$0.00
Cincinnati Bell	\$0.00	\$0.00	\$0.00	\$0.00
	\$1,655.39	\$903.53	\$1,645.91	\$913.01
Charter Corp	(\$0.40)	\$0.00	(\$0.40)	\$0.00
Comm Sys Net	\$111.22	\$55.61	\$111.22	\$55.61
Computer Svcs Consolidated Network	\$241.37	\$20.88	\$164.87	\$97.38
Consolidated Network	\$2,175.88	\$0.00	\$2,175.88	\$0.00
Conquest Long Dist	\$2,935.03	\$0.00	\$2,935.03	\$0.00
Conquest Long Dist 2	\$1,354.06	\$834.92	\$1,401.03	\$787.95
ITT 401488	\$1.60	\$0.00	\$0.40	\$1.20
ITT 2	\$87.61	\$44.65	\$84.91	\$47.35
ITT 401999	\$341.77	\$144.56	\$304.43	\$181.90
LDDS Comm	\$0.00	\$0.00	\$0.00	\$0.00
LGHTCLLCR	\$29,494.97	\$5,731.34	\$33,289.78	\$1,936.53
LD Spec	\$122,635.16	\$0.00	\$86,378.86	\$36,256.30
LD Spec 2	\$32,221.79	\$0.00	\$28,162.98	\$4,058.81
LD Spec 3	\$21,577.56	\$2,548.08	\$11,577.56	\$12,548.08
LD Spec 4	\$1,720.49	\$0.00	\$1,654.18	\$66.31
Long Dist Ohio Inc	\$32,547.70	\$0.00	\$24,240.59	\$8,307.11
Litel	\$24,483.21	\$0.00	\$18,520.88	\$5,962.33
Litel 2	\$97.95	\$0.00	\$81.67	\$16.28
Long Dist Svc of Wash	\$177.01	\$133.29	\$133.29	\$177.01
Long Dist Tele Savers	\$41,346.23	\$0.00	\$22,193.24	\$19,152.99
HCI	\$122,142.90	\$0.00	\$104,715.78	\$17,427.12
HCI 2	\$678.60	\$0.00	(\$173.64)	\$852.24
MCI 3	\$72.41	\$140.61	\$140.61	\$72.41
Metromedia Long Dist	\$66.81	\$35.60	\$63.64	\$38.77
Nat'l Tele Service	\$326.38	\$85.89	\$190.25	\$222.02
One Call Comm	\$344.03	\$163.65	\$319.81	\$187.87
RCI	\$0.09	\$0.00	\$0.09	\$0.00
RCI 2	\$7.29	\$0.00	\$4.84	\$2.45
Sears Tech Svc. Inc	\$0.83	\$0.00	\$0.83	\$0.00
South Tel	\$14,196.77	\$0.00	\$5,328.81	\$8,867.96
US Sprint		\$19,250.25	\$41,322.88	\$7,559.01
US Sprint 2	\$29,631.64 \$5,653.62	\$2,893.06	\$5,672.64	\$2,874.04
US Sprint 3	\$0.00	\$0.00	\$0.00 }	\$0.00
Starnet		\$0.00	\$14,710.38	\$2,900.20
State of Ohio-Attn: Tele	\$9,554.73	\$6,629.71	\$11,129.72	\$5,054.72
THC	\$365.80	\$172.79	\$351.32	\$187.27
TMC 2	\$3,886.47	\$301.13	\$2,782.41	\$1,405.19
Telecon	\$295.60	\$643.58	\$932.05	\$7.13
Telecon 2	\$39.14	\$27.26	\$44.72	\$21.68
Tele-Fibernet Corp	\$179.29	\$0.00	\$0.00	\$179.29
Telenet	\$879.11	\$0.00	\$749.28	\$129,83
Telesphere Network	3017.11/		•	

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Telus Comm	\$0.22/	\$0.001	\$0.22/	\$0.00
Unitel	\$4,751.154	\$0.001	\$4,557.02	\$194.13
Western Union	\$9.591	\$103.31	\$86.98	\$25.92
Westinghouse Elec Corp	\$1.01	\$0.001	(\$1.61)	\$2.62

\$143,995.17

TOTAL Current Billing Source: Client provided handwritten workpaper, $\angle DD$ OCC~9~-~OCC-11

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